

ENTER: December 31, 2013

**IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

In Re: Coloplast Corp. Pelvic Repair System	§	
Products Liability Litigation	§	MDL No. 2387
	§	
THIS DOCUMENT RELATES TO:	§	
	§	
Janice L. Blackburn and Jake Blackburn v.	§	Civil Action No. 2:12-cv-04686
Coloplast Corp., et al.	§	
	§	


 JOSEPH R. GOODWIN
 UNITED STATES DISTRICT JUDGE

**NOTICE OF MOTION FOR LEAVE
 TO FILE A FIRST AMENDED COMPLAINT**

Plaintiffs, by and through counsel, hereby moves this Honorable Court for an Order granting Plaintiffs' Leave to File their Amended Complaint.

PLEASE TAKE FURTHER NOTICE that in support of the within motion plaintiffs shall rely upon the Certification of Karen Beyea-Schroeder, Esquire, attached hereto. A proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that we have conferred with the defendants and they do not oppose this motion. Therefore, the moving party does not request oral argument on this application unless opposition is filed.

A copy of the proposed Amended Complaint is attached hereto and marked as Exhibit "A."

Dated: December 26, 2013

Respectfully submitted,

/s/Karen Beyea-Schroeder

Attorney for Plaintiffs

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